

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

**JOSE TRUJILLO and
TIMOTHY MARX,
on behalf of themselves and
all others similarly situated,**

Plaintiffs,

CASE NO. 13-cv-1096

v.

SAELEN CORPORATION,

Defendant.

PETITION FOR ATTORNEYS' FEES AND COSTS

NOW COME Plaintiffs, by and through their attorneys, Hawks Quindel, S.C., to respectfully petition the Court for an award of costs and attorneys' fees as set forth below and on those grounds set forth in Plaintiffs' supporting Memorandum of Law and the accompanying declarations of Attorneys Summer H. Murshid, Brenda Lewison, Janet L. Heins, and Rebecca L. Salawdeh.

1. Class Counsel has negotiated the settlement of this FLSA collective action and Rule 23 class action on behalf of a class that includes approximately 140 individuals.

2. The settlement creates a common settlement fund of \$49,900.00. Plaintiffs petition for recovery of their attorneys' fees of \$16,633.33 – equal to roughly 33.33% of the common settlement fund – as well as costs of \$932.18 for a total of \$17,565.51.

3. As set forth in greater detail in Plaintiffs' supporting Memorandum of Law and accompanying declarations, the requested award is consistent with the market rate for similar cases.

WHEREFORE, Plaintiffs respectfully request that the Court award costs and attorneys' fees as set forth above.

Dated this 21st day of April, 2014.

Respectfully submitted,

HAWKS QUINDEL S.C.
Attorneys for Plaintiffs

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